

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

NOV 24 2014
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

No.

CHARLES MARTIN

Defendant.

4:14CR00379 NAB

MISDEMEANOR INFORMATION

COUNT I

The United States Attorney charges that:

A. Defendant Obtains Two Social Security Numbers

1. On or about March 26, 1963, CHARLES MARTIN (“defendant”) applied for a social security number with the Social Security Administration (SSA) and was assigned a social security number ending in 8231.
2. On or about December 12, 1986, defendant applied for a social security card with the SSA and falsely stated in an “Application for a Social Security Card Number” that a social security number card had never been requested for himself.
3. On or about December 12, 1986, defendant was assigned a social security number ending in 5840.
4. On or about October 16, 1987, defendant applied with the SSA for a replacement

social security card for his social security number ending in 8231.

5. On or about February 11, 2005, defendant applied with the SSA for a replacement social security card for his social security number ending in 5840.

B. Defendant Obtains Social Security Benefits Using Two Social Security Numbers

6. On or about February 25, 2005, defendant applied with the SSA for Title II Disability Insurance Benefits (DIB) and Title XVI Supplemental Security Income (SSI) Disability Benefits using his social security number ending in 8231. On or about February 25, 2005, defendant was approved for DIB benefits under his work history associated with his social security number ending in 8231 and began to receive benefit payments. Defendant's application for SSI benefits was denied.

7. On or about April 19, 2011, within the Eastern District of Missouri, defendant applied for DIB and SSI with the SSA in an "Application Summary for Supplemental Security Income" and an "Application Summary for Disability Insurance Benefits." Defendant used his social security number ending in 5840 to apply for these benefits. In both applications, defendant falsely stated that he had never used any other social security number, even though he was using the social security ending in 8231 to receive DIB. Defendant also falsely stated that no previous application had been filed for him with the SSA.

8. On or about April 19, 2011, defendant was approved for SSI under his social security number ending in 5840. Defendant's application for DIB benefits was denied.

9. On or about May 31, 2011 and August 6, 2013, defendant submitted to SSA forms concerning his receipt of SSI under his social security number ending in 5840 and failed to disclose to the SSA that he was receiving DIB under social security number 8231.

10. From or about the year 2005 through about the year 2014, defendant used his

social security number ending in 8231 and received from the SSA approximately \$149,287.90 in DIB.

11. From on or about April 2011 through on or about December 2013, defendant used his social security number ending in 5840 and embezzled, stole, purloined, or knowingly converted to his use approximately \$20,284.99 in government property that SSI paid to defendant and that defendant was not entitled to receive because he was receiving DIB from SSA using another social security number assigned to defendant ending in 8231.

In or about September, 2013, within the Eastern District of Missouri,

CHARLES MARTIN,

the defendant herein, did embezzle, steal, purloin, or knowingly convert to his use money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: defendant stole government funds in the amount of \$685.00.

In violation of Title 18, United States Code, Section 641.

COUNT II

The United States Attorney further charges that:

1. The allegations contained in paragraphs 1 through 11 of Count One of this Misdemeanor Information are restated and incorporated herein.

2. In or about October 2013, within the Eastern District of Missouri,

CHARLES MARTIN,

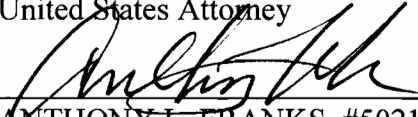
the defendant herein, did embezzle, steal, purloin, or knowingly convert to his use money of the United States or of any department or agency thereof, or any property made or being made under

contract for the United States or any department or agency thereof, to wit: defendant stole government funds in the amount of \$685.00.

In violation of Title 18, United States Code, Section 641.

Respectfully submitted,

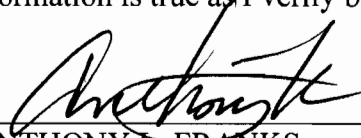
RICHARD CALLAHAN
United States Attorney



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UNITED STATES OF AMERICA)
EASTERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

I, Anthony L. Franks, Assistant United States Attorney for the Eastern District of Missouri,
being duly sworn, do say that the foregoing information is true as I verily believe.



ANTHONY L. FRANKS

Subscribed and sworn to before me this 24th day of November 2014.



CLERK, U.S. DISTRICT COURT

By: 

DEPUTY CLERK